

OCT 10 1984

ALEXANDER L. STEVAS,  
CLERK

IN THE  
**Supreme Court of the United States**

OCTOBER TERM, 1984

GERALDINE FENNELL,  
on behalf of herself and all others similarly situated,  
*Petitioner,*  
—against—

WARNER-LAMBERT COMPANY,  
*Respondent.*

On Petition for a Writ of Certiorari to the United States  
Court of Appeals for the Second Circuit

**RESPONDENT'S RULE 28.1 STATEMENT**

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August 9, 1984

NO. 83-2063

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**RESPONDENT'S RULE 28.1 STATEMENT**

Respondent Warner-Lambert Company ("Warner-Lambert") has no parent corporations. The common stock of Warner-Lambert is publicly traded on the New York Stock Exchange.

The following is a list of the subsidiaries of Warner-Lambert, as set forth in Exhibit 22 to the Form 10-K filed by Warner-Lambert with the Securities and Exchange Commission, showing the state or country of incorporation and the percentage of voting securities owned by Warner-Lambert or by subsidiaries of Warner-Lambert as of December 31, 1983. There have been no material changes since that date. Except as otherwise indicated, such subsidiaries are included in the consolidated financial statements.

"Name of Corporation	State or Country of Organization	Percentage of Ownership	
Adams, S.A. ....	Spain	100	
Adams Dominicana, S.A. ....	Dominican Republic	100	
Adams France S.A. ....	France	100	
Ahmex, S.A. ....	Mexico	100	
American Chicle Company ....	Delaware	100	
American Food Industries, Inc. ..	Delaware	100	
Clark Gum Company Morocco.	Morocco	100	American Food Industries, Inc.
Chamberlain's (Proprietary) Limited .....	South Africa	96	
		4	Parke-Davis
Wilcox Sweets (Proprietary) Limited .....	South Africa	100	Chamberlain's (Proprie- tary) Limited
Chicle Adams, Inc. ....	New York	100	
Chicle Adams S.A. ....	Venezuela	100	Chicle Adams, Inc.
Chicle Adams S.A. ....	Colombia	100	(Direct & Indirect)
Chicle Adams, S.A. de C.V. ....	Mexico	100	
Cirsa S.A. ....	Venezuela	100	
Velarca S.A. ....	Venezuela	80	Cirsa S.A.
Clark Gum Company N.V. ....	Belgium	100	
Compania de Chicle Adams, Inc...	New York	100	
Parke Davis & Cia. de Argentina, S.A.I.C. ....	Argentina	100	Compania de Chicle Adams, Inc.
Warner-Lambert Argentina, S.A. ....	Argentina	81.5	Compania de Chicle Adams, Inc.

"Name of Corporation	State or Country of Organization	Percentage of Ownership	Percentage of Ownership
		18.5	Warner-Lambert Company A.G.
Chicle Adams del Uruguay S.A.	Uruguay	100	Compania de Chicle Adams, Inc.
Distribuidora Mercantil Centro- americana, S.A. ....	Delaware	100	
Distribuidora Mercantil Centro- americana de Costa Rica, S.A.	Costa Rica	100	Distribuidora Mercantil Centroamericana, S.A.
Empresas Warner-Lambert S.A...	Chile	70.6	
		29.4	Parke-Davis
Euronett, Inc. ....	Delaware	100	
Eversharp, Inc. ....	Delaware	100	
Family Products Corporation ....	New York	100	
Laboratorios Laprofa, Sociedad Anonima .....	Guatemala	100	Family Products Corpora- tion
Laboratorios Warner, Ltda...	Brazil	100	Family Products Corpora- tion
Golosinas Peruanas S.A. ....	Peru	100	
IMED Corporation .....	Delaware	100	
Med-Tech Ventures, Inc. ..	Delaware	100	IMED Corporation
IMED International Corporation.	Cayman Islands, British West Indies	100	
IMED Australia Pty. Limited	Australia	100	IMED International Corporation
IMED Canada Inc. ....	Canada	100	IMED International Corporation
IMED G.m.b.H. ....	Germany	100	IMED International Corporation

"Name of Corporation	State or Country of Organization		Percentage of Ownership
IED Ireland Limited .....	Ireland	100	IMED International Corporation
IMED Limited .....	United Kingdom	100	IMED International Corporation
IMED Management Services Limited .....	United Kingdom	100	IMED International Corporation
Internacional Participacoes Ltda. .	Brazil	100	
Warner-Lambert Industria E Comercio Ltda. ....	Brazil	100	Internacional Participacoes Ltda.
Chadams Participacoes E Comercia Ltda. ....	Brazil	100	Warner-Lambert Industria E Comercio Ltda.
International Affiliated Corporation .....	Delaware	100	
Farmaceutica y Comercial Sociedad Anonima .....	Bolivia	100	International Affiliated Corporation
Goedecke A.G. ....	Germany	87.96	International Affiliated Corporation
		11.44	Warner-Lambert International Capital Corporation
		.20	
Goedecke Gesellschaft m.b.H.	Austria	100	Goedecke A.G.
Adenylchemie G.m.b.H. ....	Germany	100	Goedecke A.G.
Institut fur Immunforschung und Serumherstellung Dr. Helmbold G.m.b.H. ....	Germany	100	Goedecke A.G.
International Company for Gum and Confectionery (Incogum) S.A.E. ....	Egypt	57	Goedecke A.G.

"Name of Corporation	State or Country of Organization		Percentage of Ownership
Parke Davis Afrique de l'Ouest .....	Senegal	100	Goedecke A.G.
Panserv-Anzeigen-Service G.m.b.H. ....	Germany	100	Goedecke A.G.
W. R. Warner & Co. G.m.b.H. ....	Germany	100	Goedecke A.G.
Parke-Davis Sendirian Berhad	Malaysia	100	International Affiliated Corporation
Invalpa S.A. ....	Peru	100	
Keystone Chemurgic Corp. ....	Delaware	100	
Chicle Adams C.A. Limited ..	Bermuda	100	Keystone Chemurgic Corp.
Productos Adams, S.A. ....	Guatemala	100	Keystone Chemurgic Corp.
Laboratories Substantia, Societe Anonyme .....	Belgium	100	
Laboratorios Substantia C.A. ....	Venezuela	80	
Laboratorios Sanitol Sociedad de Responsabilidad Limitada ....	Argentina	100	(Direct & Indirect)
Lambert & Feasley, Inc. ....	New York	100	
Lambert Pharmacal Company (N.Z.) Limited .....	New Zealand	100	
Manufacture de Confiserie Manuco	France	100	(Direct & Indirect)
*Meito Adams Co., Ltd. ....	Japan	50	
Parfums Ciro, Inc. ....	Delaware	100	
Parke, Davis & Company ("Parke-Davis") .....	Michigan	100	
Compania Medicinal La Cam- pana, S.A. de C.V. ....	Mexico	38.4	Tabor Corporation
		61.6	Parke-Davis

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\*Subsidiary not consolidated

"Name of Corporation	State or Country of Organization	Percentage of Ownership	
Deseret International Sales Corporation .....	Utah	100	Parke-Davis
R. Jung G.m.b.H. ....	Germany	100	Parke-Davis
P-D Co., Inc. ....	Delaware	100	Parke-Davis
Davpar Company .....	Switzerland	100	P-D Co., Inc.
Capsugel A.G. ....	Switzerland	100	Davpar Company
S.A. Capsugel N.V. ....	Belgium	100	Davpar Company
Hidracina y Derivados S.A. .	Spain	100	Davpar Company
Laboratoris Park Davis, S.A.E. ....	Spain	100	Davpar Company
N.V. Parke, Davis & Cie., S.A. ....	Belgium	100	Davpar Company
Parke, Davis S.p.A. ....	Italy	65.17	Davpar Company
		1.50	Parke-Davis
		33.33	Warner-Lambert Interna- tional Capital Corporation
Quimica Sintetica, S.A. ....	Spain	100	Davpar Company
Societe Financiere et Com- merciale de Cadillac .....	France	100	Davpar Company
Parke Davis (Bahamas) Limited .....	Bahamas	100	Parke-Davis
Parke Davis & Co. Limited ..	Jersey, Channel Islands	100	Parke-Davis
Parke, Davis & Company, Inc. .	Philippines	100	Parke-Davis
Parke, Davis & Company, Limited .....	Pakistan	75	Parke-Davis
Warner-Lambert (Pakistan) Limited .....	Pakistan	100	Parke, Davis & Company, Limited

"Name of Corporation	State or Country of Organization	Percentage of Ownership	
Parke Davis Corporation ....	Taiwan	50	Parke-Davis
		50	
Parke Davis Inter-American Corporation .....	Delaware	100	Parke-Davis
Compania Farmaceutica Parke-Davis S.A. ....	Guatemala	100	Parke Davis Inter- American Corporation
Parke Davis International Limited .....	Bahamas	100	Parke-Davis
Laboratorios Indufarma, S.A.	Peru	100	Parke Davis International Limited
Parke-Davis International Sales Corporation .....	Delaware	100	Parke-Davis
Parke Davis Pty. Ltd. ....	Australia	100	Parke-Davis
Warner-Lambert Pty. Limited .....	Australia	100	Parke Davis Pty. Ltd.
Warner-Lambert (Services) Pty. Ltd. ....	Australia	100	Parke Davis Pty. Ltd.
Parke-Davis (Thailand) Limited .....	Thailand	100	Parke-Davis
Parke Davis de Venezuela, C.A.	Venezuela	100	Parke-Davis
Parke Davis Zaire S.P.R.L. ..	Zaire	100	Parke-Davis
Unilease, Inc. ....	Nevada	100	Parke-Davis
Richard Hudnut .....	New York	100	
Richard Hudnut S.A. ....	France	89	Richard Hudnut
		11	Parfums Ciro, Inc.
Parke-Davis .....	France	100	Richard Hudnut S.A.
Laboratoires Substantia, Societe Anonyme .....	France	81.1	Richard Hudnut S.A.
		18.9	P-D Co., Inc.



"Name of Corporation	State or Country of Organization	Percentage of Ownership	
General Diagnostics France, S.A. ....	France	100	Richard Hudnut S.A.
Richard Hudnut Limited .....	New Zealand	100	
Chilab (Realty) Limited .....	New Zealand	50	Richard Hudnut Limited
		50	Warner-Lambert (NZ) Ltd.
Warner-Chilcott (Mfg.) Limited .....	New Zealand	50	Richard Hudnut Limited
		50	Warner-Lambert (NZ) Ltd.
Schick Interamericana S.A. ....	Venezuela	100	
Servicos Technicos e Comercio "Sertico" Ltda. ....	Brazil	100	
"Protequim"—Productos Tecni- cos—Quimicos Ltda. ....	Brazil	100	Servicos Technicos e Comercio "Sertico" Ltda.
Standard Laboratories, Inc. ....	Delaware	100	
Bathasweet Corporation .....	New York	100	Standard Laboratories, Inc.
"Substantia" Gesellschaft m.b.H..	Austria	100	
Tabor Corporation .....	Delaware	100	
Warner-Hudnut (Lanka) Limited .....	Sri Lanka	70	Tabor Corporation
TetraWerke Dr. rer. nat. Ulrich Baensch G.m.b.H. ....	Germany	100	(Indirect)
Zoomedica Frickhinger G.m.b.H. ....	Germany	100	TetraWerke Dr. rer. nat. Ulrich Baensch G.m.b.H.
West-Aquarium G.m.b.H. ....	Germany	100	TetraWerke Dr. rer. nat. Ulrich Baensch G.m.b.H.

"Name of Corporation	State or Country of Organization		Percentage of Ownership
West-Aquarium KG .....	Germany	96.5	TetraWerke Dr. rer. nat. Ulrich Baensch G.m.b.H.
		3.5	West-Aquarium G.m.b.H.
Warner-Chilcott, Inc. ....	Delaware	100	
Warner-Lambert Inc. ....	Nevada	94	
		6	Warner-Lambert International Capital Corporation
Warner-Lambert Canada, Inc. ..	Canada	100	
Adams Brands Inc. ....	Canada	100	Warner-Lambert Canada, Inc.
Parke-Davis Canada Inc. ....	Canada	100	Warner-Lambert Canada, Inc.
Deseret Canada Inc. ....	Canada	100	Warner-Lambert Canada, Inc.
Warner-Lambert Company A.G. .	Switzerland	100	
Adams (Thailand) Limited ..	Thailand	100	Warner-Lambert Company A.G.
Laboratorio Substancia/Parke-Davis, S.A. ....	Spain	75	Warner-Lambert Company A.G.
		25	Bathasweet Corporation
Cosmeticos Internacionales, S.A. ....	Spain	100	Laboratorio Substancia/Parke-Davis, S.A.
Warner-Lambert (East Africa) Limited .....	Kenya	100	Warner-Lambert Company A.G.
Warner-Lambert Export Limited .....	Ireland	100	Warner-Lambert Company A.G.

"Name of Corporation	State or Country of Organization		Percentage of Ownership
Warner-Lambert Peru S.A. ...	Peru	59	Warner-Lambert Company A.G.
		41	Tabor Corporation
Warner-Lambert de Panama, S.A.	Panama	100	(Indirect)
Warner-Lambert Financial Corp.	Delaware	100	
Warner-Lambert France Ltd. ....	Delaware	100	
Warner-Lambert Ges.m.b.H. ....	Austria	100	(Direct & Indirect)
Warner-Lambert Holland B.V. ..	Netherlands	100	
B.V. Substantia .....	Netherlands	100	Warner-Lambert Holland B.V.
Substantia—Produtos Farmaceuticos, Limitada .....	Portugal	99.5	B.V. Substantia
		.5	Laboratoires Substantia, Societe Anonyme
Eversharp Nederland B.V. ....	Netherlands	100	Warner-Lambert Holland B.V.
J.P. Distributie N.V. ....	Belgium	100	Eversharp Nederland B.V.
Schick-Eversharp Gesellschaft mit beschränkter Haftung.	Germany	100	Eversharp Nederland B.V.
Warner-Lambert International Capital Corporation .....	Delaware	100	
Adams Portugal Comercio E Industria Limitada .....	Portugal	90.	Warner-Lambert International Capital Corporation
		10	Chicle Adams, Inc.
Richard Hudnut, S.A. ....	Spain	100	Warner-Lambert International Capital Corporation
Societe Civile de Recherches Techniques S.A.R.L. ....	France	100	Warner-Lambert International Capital Corporation

"Name of Corporation	State or Country of Organization	Percentage of Ownership
Warner-Lambert International, N.V. ....	Netherlands Antilles 100	
Warner-Lambert International Company .....	Delaware 100	
Warner-Lambert Manufacturing (Ireland) Ltd. ....	Cayman Islands, British West Indies 100	
Warner-Lambert K.K. ....	Japan 100	(Indirect)
Parke, Davis K.K. ....	Japan 100	Warner-Lambert K.K.
Warner-Lambert Ltd. ....	Delaware 100	
Warner-Lambert (NZ) Limited .	New Zealand 100	
Warner-Lambert Philippines, Inc.	Phillipines 56.1	
	43.9	Parke-Davis
Warner-Lambert Scandinavia AktieBolag .....	Sweden 100	
Warner-Lambert Sweden AB	Sweden 100	Warner-Lambert Scandina- via AktieBolag
Warner-Lambert (Norway) A/S .....	Norway 100	Warner-Lambert Sweden A.L.
Warner-Lambert (Schweiz) A.G.	Switzerland 100	
Warner-Lambert Technologies, Inc. ....	Texas 100	
C. Reichert Optische Werke A.G. ....	Austria 99.99	Warner-Lambert Technol- ogies, Inc.
C. Reichert Handelsgesell- schaft m.b.H. ....	Austria 100	C. Reichert Optische Werke A.G.

"Name of Corporation	State or Country of Organization		Percentage of Ownership
Reichert Jung, S.A. ....	France	100	C. Reichert Optische Werke A.G.
W-L Technologies (Japan) Inc.	Japan	100	Warner-Lambert Technologies, Inc.
Warner-Lambert Technologies (Asia) Ltd. ....	Delaware	100	Warner-Lambert Technologies, Inc.
Warner-Lambert (U.K.) Limited .....	Delaware	100	
Fleming & Reichert-Jung Limited .....	United Kingdom	100	Warner-Lambert (U.K.) Limited
Reichert-Jung Limited .....	United Kingdom	100	Fleming & Reichert-Jung Limited
William R. Warner & Co., Ltd.	United Kingdom	100	Warner-Lambert (U.K.) Limited
Adams Brands Sales, Limited	United Kingdom	100	William R. Warner & Co., Ltd.
Chilcott Laboratories, Limited .....	United Kingdom	100	William R. Warner & Co., Ltd.
Hall Borthers (Whitefield) Limited .....	United Kingdom	100	William R. Warner & Co., Ltd.
Richar Hudnut, Limited ....	United Kingdom	100	William R. Warner & Co., Ltd.

"Name of Corporation	State or Country of Organization		Percentage of Ownership
Lambert Chemical Company, Limited .....	United Kingdom	100	William R. Warner & Co., Ltd.
TetraMin (U.K.) Limited ..	United Kingdom	100	William R. Warner & Co., Ltd.

The foregoing list omits 11 domestic subsidiaries and 57 foreign subsidiaries which considered in the aggregate would not constitute a significant subsidiary."

Respectfully submitted,

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*Attorneys for Respondent  
 Warner-Lambert Company*

August 9, 1984

**Affidavit of Service**

STATE OF NEW YORK }  
COUNTY OF NEW YORK } ss.:

REX W. MIXON, JR., being duly sworn, deposes and says that, pursuant to Rule 28.3 of the Supreme Court Rules, he served the foregoing Respondent's Rule 28.1 Statement upon petitioner by mailing on August 9, 1984, three true and correct copies thereof, first class mail postage prepaid to petitioner Geraldine Fennell, *pro se*, 59 Rennell Street, Bridgeport, Connecticut 06604.

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REX W. MIXON, JR.

Sworn to before me this  
9th day of August, 1984

Notary Public